

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT  
SYSTEMS ANTITRUST LITIGATION**

**MDL No. 2817  
Case No. 18-cv-00864**

**This Document Relates To:  
THE DEALERSHIP CLASS ACTION**

**Hon. Rebecca R. Pallmeyer**

**DECLARATION OF PEGGY J. WEDGWORTH**

I Peggy J. Wedgworth Esq., pursuant to 28 USC § 1746 hereby declare:

1. I am partner at Milberg Coleman Bryson Grossman, PLLC. As Dealership Interim Lead Class Counsel and MDL Co-Lead Counsel in the above-captioned matter, I represent the following Dealership Class Plaintiffs: Continental Autos, Inc., d/b/a Continental Toyota; Continental Classic Motors, Inc., d/b/a Continental Autosports; Kenny Thomas Enterprises, Inc., d/b/a Olathe Toyota; Waconia Dodge, Inc.; John O'Neil Johnson Toyota, LLC; Jim Marsh American Corporation, d/b/a Jim Marsh Mitsubishi Suzuki Kia Mahindra; Pitre Imports, LLC, d/b/a Pitre Kia; Pitre, Inc., d/b/a Pitre Buick GMC; Patchogue 112 Motors LLC, d/b/a Stevens Ford; JCF Autos LLC, d/b/a Stevens Jersey City Ford; Jericho Turnpike Sales LLC, d/b/a Ford & Lincoln of Smithtown; Gregoris Motors, Inc.; Marshall Chrysler Jeep Dodge, L.L.C., d/b/a Marshall Chrysler Jeep Dodge Ram; Cliff Harris Ford, LLC, d/b/a Warrensburg Ford; Warrensburg Chrysler Dodge Jeep, L.L.C., d/b/a Warrensburg Chrysler Dodge Jeep Ram Fiat; and Hoover Automotive, LLC, d/b/a Hoover Dodge Jeep of Summerville.<sup>1</sup>

---

<sup>1</sup> I also represent new proposed Class representatives in this litigation: Henry Brown Buick GMC, LLC d/b/a Henry Brown Buick GMC; GSM Auto Group, LLC, d/b/a Infiniti Mission Viejo; GSM Auto Group II, LLC, d/b/a Audi Mission Viejo; GSM Auto Group III, LLC, d/b/a Volvo Cars Mission Viejo; Sandy Sansing Chevrolet, Inc. d/b/a Sandy Sansing Chevrolet Pensacola; Tony Automotive Group LLC d/b/a (i) Tony Volkswagen; (ii) Tony Hyundai; (iii) Genesis of Waipio; and (iv) Tony Hyundai Honolulu; Tony Hawaii LLC d/b/a Tony Honda; Pacific Nissan LLC d/b/a Tony Nissan; Tony Hawaii Hilo LLC d/b/a Tony Honda Hilo; Tony Hawaii Kona LLC d/b/a Tony Honda Kona; Duteau Chevrolet Co., d/b/a DuTeau Chevrolet; Landmark Ford; Automaster BMW; Automaster Honda; Automaster

2. I submit this declaration in support of Dealership Class Plaintiffs' Sur-Reply in Further Support of Their Motion for Class Certification.

3. I have personal knowledge of the matters set forth herein and could and would testify competently thereto if called to do so.

4. Attached hereto as **Exhibit A** is a true and correct copy of the June 14, 2024 Expert Sur-Reply Class Certification Report of Michael A. Williams, Ph.D.

5. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the February 12, 2024 deposition transcript of Michael A. Williams.

6. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the January 19, 2024 deposition transcript of Mark A. Israel, Ph.D.

7. Attached hereto as **Exhibit 3** is a true and correct copy of ECF No. 693, Defendants' Motion to Exclude the Supplemental Report of Dr. Michael A. Williams Under Fed. R. Evid. 702 and *Daubert*, from *In re Disposable Contact Lens Antitrust*, 3:15-md-02626.

I declare under penalty of perjury that the foregoing is true and correct  
Executed in Birmingham, Alabama this 14th day of June 2024.

/s/ Peggy J. Wedgworth  
Peggy J. Wedgworth

---

Mercedes-Benz; Mini of Birmingham; L&S Motors of Beckley, Inc., d/b/a L&S Toyota of Beckley; Toyota of Ann Arbor; and Rochester Hills Chrysler Jeep Dodge Ram.